

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PEOPLETLO MANUFACTURING, INC.,

Plaintiff,

v.

**SUNDYNE, LLC; DXP ENTERPRISES,
INC.; and PUMPWORKS, LLC,**

Defendants,

Case No. 1:20-cv-03642

Honorable Manish S. Shah

Magistrate Judge Young B. Kim

PUMPWORKS, LLC,

Counter-Plaintiff,

v.

PEOPLETLO MANUFACTURING, INC.,

Counter-Defendant.

**DEFENDANT PUMPWORKS, LLC’S UNOPPOSED MOTION FOR LEAVE TO FILE
THREE EXHIBITS TO SUPPORT ITS PROVE UP OF DAMAGES UNDER SEAL**

Defendant/Counter-Plaintiff Pump Works, LLC (“PumpWorks”) respectfully seeks leave permitting PumpWorks to file under seal Exhibits 3, 5 and 10 to PumpWorks Memorandum In Support of Its Prove up of Damages under seal. In support of this motion, PumpWorks state as follows:

1. On October 2, 2020, the parties submitted an Agreed Confidentiality Order to this Court. (Dkt. 33.) Pursuant to that Order, the parties agreed that certain documents, information, or materials produced and obtained during the course of discovery in this matter could be designated as “Confidential-Subject to Protective Order” or “Highly Confidential-Attorney’s Eyes Only.”

2. The Agreed Confidentiality Order specifically provides that parties may designate as “Confidential – Subject to Protective Order” (a) information prohibited from disclosure by statute or contract; (b) information that reveals trade secrets; (c) research, technical, commercial or financial information that the party has maintained as confidential or has a duty to a third-party to maintain as confidential; (d) medical information concerning any individual; (e) personal identity information; (f) income tax returns (including attached schedules and forms), W-2 forms and 1099 forms; or (g) personnel or employment records of a person who is not a party to the case.
3. PeopleFlo has designated documents incorporated in Exhibits 3, 5 and 10 to PumpWorks’s Memorandum as “Confidential.”
4. Exhibit 3 is a set of PeopleFlo invoices marked as “Confidential.”
5. Exhibit 5 is a set of PeopleFlo packing slips marked as “Confidential.”
6. Exhibit 10 is an email attaching a statement of invoices marked “Confidential.”
7. While PumpWorks does not agree that the information contained in these exhibits are in fact confidential, because PeopleFlo marked them “Confidential” PumpWorks is under an obligation under the Agreed Confidentiality Order to take all necessary steps to maintain their confidentiality.
8. Accordingly, there is good cause for PumpWorks to seek leave to file under seal Exhibits 3, 5 and 10 to its prove up of damages pursuant to the Agreed Confidentiality Order.
9. The instant motion is made in good faith and not for the purpose of delay or harassment.
10. On August 15, 2025 PumpWorks’ counsel asked PeopleFlo’s counsel if they had any objection to the filing of the referenced documents under seal. PeopleFlo does not oppose the relief requested in this Motion.

WHEREFORE, for the foregoing reasons, PumpWorks respectfully request that the Court enter an order granting it leave to file their Exhibits 3, 5 and 10 to its prove up of damages under seal.

Date: August 15, 2025 Respectfully submitted,

PUMPWORKS, LLC

By: /s/ Monica L. Thompson

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